

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Revision of the Commission's Rules)	CC Docket No. 94-102
to Ensure Compatibility with Enhanced)	
E911 Emergency Calling Systems)	
)	

To: The Wireless Telecommunications Bureau

**Carrier Report of OTZ Telecommunications, Inc. Regarding
Implementation of Wireless E911 Phase II Automatic Location Identification**

OTZ Telecommunications, Inc. ("OTZ") hereby submits a report regarding implementation of wireless E911 Phase II Automatic Location Identification ("ALI") in response to the Federal Communications Commission's ("FCC" or "Commission") letter, dated January 23, 2001, requiring OTZ to submit such a report in the above-referenced proceeding.

I. Background / Contact Information

OTZ serves rural Alaska and its contact information is as follows:

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II. E911 Phase II Location Technology Information

OTZ has chosen a handset solution to meet the FCC's Phase II requirements. While OTZ has concerns about general handset availability, it appears that at this time there is no practical network-based solution that will be commercially available to carriers of OTZ's small size. As a small carrier, OTZ plans to purchase its handset equipment with ALI-capability from, Brightpoint, Inc., a wholesale distributor. OTZ intends to deploy the handset-based solution throughout its service area.

III. Testing and Verification

OTZ has yet to test its ALI solution since it is still awaiting word from Brightpoint as to when it can begin purchasing ALI-capable handsets. OTZ anticipates using a combination of Empirical Testing Methods and Predictive Testing Methods to gauge the accuracy of the handsets once they become available.

IV. Implementation Details and Schedule

While OTZ is awaiting product availability from its handset vendor, it has developed a tentative implementation schedule to meet the FCC's handset-based rules. OTZ intends to begin selling its ALI-capable handsets on October 1, 2001, as the FCC's rules require.

V. PSAP Interface

OTZ has yet to receive a Phase II PSAP request. Provided that OTZ's local police department/PSAP is capable of responding to ALI-capable phones, OTZ does not foresee any major changes to its equipment in order to develop a PSAP interface. OTZ will work closely with its PSAP to ensure ALI compatibility.

VI. Handset Information

The initially expensive price of the new ALI-capable handsets, unavailable at this time, will affect OTZ's replacement strategy. However, OTZ plans to offer a buy back program with any handsets sold by OTZ. If customers did not purchase their handsets from OTZ, OTZ will offer to sell the ALI-capable phones with a three-month payment plan option. For phones that are incompatible with OTZ's system, OTZ is considering the leasing of phones for short-term accounts.

VII. Other Information

OTZ notes that the remote and rural nature of its service territory in Alaska can present additional and unforeseen problems when installing and testing location technology.

February 6, 2000